

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT, STATE OF OKLAHOMA

| | | |
|--|---|---------------------------|
| (1)TIFFANY STALLINGS, Individually and |) | |
| as Natural Mother and Next Friend of |) | |
| the minor child, TS |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Case No. CIV 18-00051-PRW |
| |) | |
| (1)PUTNAM CITY SCHOOL DISTRICT |) | |
| a/k/a) INDEPENDENT SCHOOL |) | |
| DISTRICT #1 OF OKLAHOMA |) | |
| COUNTY, STATE OF OKLAHOMA |) | |
| (2)ANGELA HABBEN, Individually, |) | |
| |) | |
| Defendant, |) | |

PLAINTIFF'S LIST OF WITNESSES AND EXHIBITS

COME NOW the Plaintiffs and hereby submit their list of Witnesses and Exhibits as follows:

WITNESSES

| <u>NAME</u> | <u>PROPOSED TESTIMONY</u> |
|--|---|
| Tiffany Stallings, Plaintiff c/o Keller, Keller & Dalton 119 North Robinson, #825 Oklahoma City, OK 73102 | TO BE DEPOSED Facts and circumstances regarding the incident; Minor child TS; damages, Injuries and school events |
| TS, A Minor child, Plaintiff 119 North Robinson, #825 Oklahoma City, OK 73102 | TO BE DEPOSED Incident; Damages; Injuries, effects of the incident; schooling |
| Angela Habben, Defendant c/o The Center for Education Law 900 North Broadway, Suite 300 | TO BE DEPOSED Facts and circumstances surrounding the incident; |

Oklahoma City, OK 73102

school policy & procedure
Training; school actions;
School reporting; IPE
Aspects education;
Disciplinary Actions taken
By school; Investigation into
The incident.

Ralph Tennyson
c/o Keller, Keller & Dalton
119 North Robinson, #825
Oklahoma City, OK 73102

Grandfather of TS; Incident
Damages and injuries to TS
schooling and learning;

Ora Tennyson
c/o Keller, Keller & Dalton
119 North Robinson, #825
Oklahoma City, OK 73102

Grandmother - TS; Incident
Damages and injuries to TS
schooling and learning

Andrea Tennyson
c/o Keller, Keller & Dalton
119 North Robinson, #825
Oklahoma City, OK 73102

Aunt of TS – Incident
Damages and Injuries to TS
schooling and learning

Dr. David Johnsen, PhD
2601 NW Expressway, Suite 410W
Oklahoma City, OK 73112

Psychologist – Incident
Damages and injuries to TS
schooling and learning

Pam Holt
Licensed Clinical Social Worker
2601 NW Expressway, Suite 410W
Oklahoma City, OK 73112

Social Worker – Incident
Damages and injuries to TS
schooling and learning

Representative of Putnam City Schools
c/o The Center for Education Law
900 North Broadway, Suite 300
Oklahoma City, OK 73102

Facts and circumstances
surrounding the incident;
school policy & procedure
training; school actions;
School reporting; IPE
Aspects education;
Disciplinary Actions taken
By school; Investigation into

LB, a Minor c/o Ron Beauschamp
Barbara Beauschamp
1512 Oak Lane
Oklahoma City, OK 73127

MG, a minor c/o Christopher Gibson
Barbara Gibson
2009 College Avenue
Bethany, OK 73008

YAB, a minor c/o George Brown
5916 NW 10th Street #205A
Oklahoma City, OK 73127

KL, a minor c/o Adrian Losson
4602 Ace Drive
Oklahoma City, OK 73127

CJ, a minor c/o Aretha Johnson
6500 West Wilshire Blvd
Oklahoma City, OK 73132

Sandy LeMasters, Communications Director
c/o The Center for Education Law
900 North Broadway, Suite 300
Oklahoma City, OK 73102

Courtney Strickland
c/o The Center for Education Law
900 North Broadway, Suite 300
Oklahoma City, OK 73102

The incident.

Student/Classmate
Incident; school, personnel,
students reactions; Minor TS
Special Education;

Student/Classmate,
Incident; school, personnel,
students reactions; Minor TS
Special Education;

Student/Classmate
incident; school, personnel
students reactions; Minor TS
Special Education;

Student/Classmate
incident; school, personnel
students reactions; Minor TS
Special Education;

Student/Classmate
incident; school, personnel
students reactions; Minor TS
Special Education;

Preservation of video of
school; Production,
Recordings on date of
incident

School Secretary
Facts and circumstances
surrounding the incident;
training; school actions;
School reporting; IEP
Aspects education;
Disciplinary Actions taken

Claudia Reyes
c/o The Center for Education Law
900 North Broadway, Suite 300
Oklahoma City, OK 73102

Facts and circumstances
surrounding the incident;
training; school actions;
School reporting; IEP
Aspects education;
Disciplinary Actions taken

Sherry Sharum
c/o The Center for Education Law
900 North Broadway, Suite 300
Oklahoma City, OK 73102

Teacher
Facts and circumstances
surrounding the incident;
school policy & procedure
training; school actions;
School reporting; IEP
Aspects education;
Disciplinary Actions taken

Kelly Moore
c/o The Center for Education Law
900 North Broadway, Suite 300
Oklahoma City, OK 73102

Teacher
Facts and circumstances
surrounding the incident
school policy & procedure
training; school actions;
School reporting; IEP
Aspects education;
Disciplinary Actions taken

Mark Stout
c/o The Center for Education Law
900 North Broadway, Suite 300
Oklahoma City, OK 73102

Chief of Police for Putnam
City Schools
Facts and circumstances
surrounding the incident;
school policy & procedure
training; school actions;
School reporting; IEP
Aspects education;
Disciplinary Actions taken

Ray Kincaide
Double Eagle Claims Investigation

Investigation into incident,
Facts and Circumstances
regarding the incident,
School policies and
procedures

Richarde Hall
Alternative Service Concepts LLC

Investigation into incident
Facts and Circumstances
regarding the incident,
School policies and
procedures

School Nurse from Apollo Elementary
c/o The Center for Education Law
900 North Broadway, Suite 300
Oklahoma City, OK 73102

Facts and circumstances
regarding the incident;
investigation into incident;
school policies and
procedures

Any Medical Office attendees
At Apollo Elementary

Facts and circumstances
regarding the incident;
investigation into incident;
school policies and
procedures

Member of the State Education Dept.

Facts and circumstances
regarding the incident;
investigation into incident;
school policies and
procedures

Any Witness listed by Defendant not objected to by Plaintiffs

PLAINTIFF EXHIBITS

1. CV of Dr. David Johnsen
2. Reports of Dr. David Johnsen
3. Medical Records from Dr. David Johnsen
4. Medical Bills of Dr. David Johnsen;
5. Medical Bill Summary
6. Video Surveillance
7. T.S. Student File;
8. T.S. IEP and Special Education Records
9. Policy and procedures Manual for Putnam City Schools
10. Insurance Agreement with OSIG
11. State Education Laws

12. Tort Claim
13. Oklahoma Statute 70 O.S. § 24-102
14. Depositions;
15. Testimony of Minor Child.T.S.
16. Clothing from the day of incident
17. Subject Wallet
18. Attendance Records;
19. Discipline records;
20. OSIG Claims Binder;
21. Special Ed Progress Reports;
22. Videos from School
23. Complaint Form filed with Putnam City School District;
24. Correspondence to Director of Communications
25. Public Request for Information Form dated 4/28/17
26. Defendants' Discovery Answers
27. Defendant's Responses to Requests for Admissions
28. Double Eagle Claims and Investigation File
29. Diagram of the School
30. State Agency Investigations of incident;
31. Any exhibit listed by Defendants not specifically objected to by Plaintiffs

Respectfully submitted,

/s/ E. W. KELLER
E W KELLER OBA# 4918
HENRY DALTON OBA# 15749
KELLER, KELLER & DALTON
119 N. Robinson, Suite 825
Oklahoma City, OK 73102
(405) 235—6693
(405) 232—3301 Facsimile
E-mail: kkd.law@coxinet.net

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of May, 2019, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of

the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Laura Holmes lholfmes@cfel.com
Justin C. Cilburn jcilburn@cfel.com

/s/ E. W. Keller